

Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

R.D. and C.D., Plaintiffs, v. BOY SCOUTS OF AMERICA, a congressionally chartered corporation, authorized to do business in Washington; CORPORATION of the PRESIDENT of the CHURCH of JESUS CHRIST of LATTER-DAY SAINTS and SUCCESSORS, a foreign corporation; and PACIFIC HARBORS COUNCIL, BOY SCOUTS OF AMERICA, fka MT. RAINIER COUNCIL, a Washington corporation. Defendants.	CAUSE NO. 2:10-cv-01006-RBL DECLARATION OF THOMAS N. PETERSEN IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT BOY SCOUTS OF AMERICA FOR SUMMARY JUDGMENT OF DISMISSAL NOTE ON MOTION CALENDAR: December 16, 2011
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I, Thomas N. Petersen, do declare that:

1. I am one of the plaintiffs' attorneys in this matter and know the following facts.

If called to testify thereto, I could and would competently do so.

2. Attached hereto as Exhibit A are true and correct copies of the deposition of James Terry, all pages and exhibits 3, 4, 13-15, 19, and 20.
3. Attached hereto as Exhibit B are true and correct copies of the deposition of Grant Robinson, pages 1-32, 80-82, 104, 109-114, 135-136.

**- 1 DECLARATION OF THOMAS N. PETERSEN IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANT BOY SCOUTS OF AMERICA
FOR SUMMARY JUDGMENT OF DISMISSAL**

4. Attached hereto as Exhibit C are true and correct copies of the 1967 and 1968 Troop 190 Charters.
5. Attached hereto as Exhibit D are true and correct copies of the Boy Scouts of America Rules and Regulations.
6. Attached hereto as Exhibit E are true and correct copies of the Mount Rainier Council Articles and Bylaws.
7. Attached hereto as Exhibit F is a true and correct copy of a 1935 New York Times article regarding Red Flag Files.
8. Attached hereto as Exhibit G is a true and correct copy of an excerpt from the 1968 Scoutmaster's Handbook.
9. Attached hereto as Exhibit H are true and correct copies of the deposition of Gary Reese, pages 15-16, 25, 26-27, 30, 35, 36, 39-40, 61, 94, 96, 116, 118, 121, 140-142, 161, 164. Ex. 4.
10. Attached hereto as Exhibit I are true and correct copies of the deposition of R.D., pages 60-63, 73-76, 80-82, 89-91, 93-95, 162, Ex. 6.
11. Attached hereto as Exhibit J are true and correct copies of the deposition of C.D., pages 20-22, 27-34, 43-44, 50-58, 60-65, 185.
12. Attached hereto as Exhibit K are true and correct copies of the deposition of Mark Dickson, pages 1-20, 48-49, 108-109.
13. Attached hereto as Exhibit L are true and correct copies of the deposition of Bart Dickson, pages 1-10.

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**- 2 DECLARATION OF THOMAS N. PETERSEN IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANT BOY SCOUTS OF AMERICA
FOR SUMMARY JUDGMENT OF DISMISSAL**

14. Attached hereto as Exhibit M are true and correct copies of the deposition of James Ely.

DATED this 9th day of December, 2011.

BLACK, CHAPMAN, WEBBER &
STEVENS

By: Thomas N. Petersen
Thomas N. Petersen
Attorneys for Plaintiffs
WSBA #32643

CERTIFICATE OF SERVICE

I hereby certify that on the December 9, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Counsel for Plaintiff

DATED this 9th day of December, 2011.

BLACK, CHAPMAN, WEBBER & STEVENS

By: s/Beth E. Sund
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